

WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP

Don Springmeyer

Nevada Bar No. 1021

Bradley S. Schrager

Nevada Bar No. 10217

Justin C. Jones

Nevada Bar No. 8519

3556 E. Russell Road, Second Floor

Las Vegas, Nevada 89120

(702) 341-5200/Fax: (702) 341-5300

dspringmeyer@wrlawyers.com

bschrager@wrlawyers.com

jjones@wrlawyers.com

Attorneys for Plaintiffs

(Additional counsel appear on signature page)

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Cung Le, Nathan Quarry, and Jon Fitch, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No. 2:15-cv-01045 RFB-(PAL)

**PLAINTIFFS' CONSOLIDATED NOTICE
OF RELATED CASES (LR 7-2.1)**

Brandon Vera and Pablo Garza, on behalf of
themselves and all others similarly situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No. 2:15-cv-01056 RFB-(GWF)

Luis Javier Vazquez and Dennis Lloyd Hallman,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No. 2:15-cv-01055 APG-(GWF)

Gabe Ruediger and Mac Danzig, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01057 JCM-(CWH)

Kyle Kingsbury and Darren Uyenoyama, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No. 2:15-cv-01046 RCJ-(NJK)

I. INTRODUCTION

Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Dennis Lloyd Hallman, Brandon Vera, Pablo Garza, Gabe Ruediger, Mac Danzig, Kyle Kingsbury, and Darren Uyenoyama (“Plaintiffs”) provide this Notice of Related Cases as required by LR 7-2.1. Plaintiffs agree with Defendant Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC (“UFC”) that these five matters are related, and should be consolidated before one single District Court Judge and one Magistrate Judge. Plaintiffs state the following to provide additional details on these actions.

II. BACKGROUND

A. Proceedings in the Northern District of California.

Plaintiffs Cung Le, Nathan Quarry, and John Fitch together filed the first of these proposed class actions on December 16, 2014 in the United States District Court for the Northern District of California (the *Le* action). The *Le* action was assigned to Judge Davila. Plaintiffs Luis Javier Vasquez and Dennis Lloyd Hallman filed the second of these actions on December 22, 2014 (the *Vasquez* action); Plaintiffs Brandon Vera and Pablo Garza filed the third of these actions on

1 December 24, 2014 (the *Vera* action); Plaintiffs Gabe Ruediger and Mac Danzig filed a fourth
2 action on February 4, 2015 (the *Ruediger* action); Plaintiffs Kyle Kingsbury and Darren
3 Uyenoyama filed a fifth action on March 20, 2015 (the *Kingsbury* action). As all subsequently
4 filed actions mirror the allegations of the *Le* action, the *Vasquez*, *Vera*, *Ruediger*, and *Kingsbury*
5 actions were deemed related to the *Le* action, and all were assigned to Judge Davila. (*Le* Dkt. Nos.
6 18, 19, 59, 67.)

7 All of the actions allege on behalf of two classes of UFC mixed martial arts fighters that
8 the UFC violated Section 2 of the Sherman Act. The actions further allege that, through a series of
9 anticompetitive, illicit, and exclusionary acts, the UFC has illegally acquired, enhanced, and
10 maintained dominant positions in the markets for (a) promoting live Elite Professional MMA
11 events, and (b) the market for Elite MMA Fighter services. Plaintiffs allege that, as a result of the
12 alleged anticompetitive scheme, the UFC has enhanced and maintained its market and monopsony
13 power and used that power to artificially suppress Plaintiffs' compensation associated with
14 fighting bouts and for their identity rights.

15 Plaintiffs in all of these cases had moved to consolidate all five matters before Judge
16 Davila for pretrial purposes;¹ Plaintiffs moved to appoint interim co-lead counsel; Plaintiffs served
17 the UFC with their first set of requests for production of documents; the UFC filed the same Rule
18 12(b)(6) motion to dismiss in all actions; and the UFC moved to stay discovery pending its motion
19 to dismiss. The latter motions were pending before Judge Davila at the time of transfer. The parties
20 have been treating the *Le* action as the "lead case" (*Le* Dkt. No. 80), and deadlines for the later-
21 filed actions were governed by those set in the *Le* action.

22 On June 2, Judge Davila transferred these matters to this District, and terminated all
23 pending hearings and motions.
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27 ¹ Pretrial consolidation was not opposed. Rather, the UFC requested that consolidation be for all purposes,
28 including trial. (*Le* Dkt. 61.)

1 **B. Proceedings in this District.**

2 The *Le* action was assigned to United States District Judge Richard F. Boulware, II and
3 Magistrate Judge Peggy A. Leen on June 4. The *Le* action has the lowest assigned case number of
4 all five actions.

5 The *Vera* action was also assigned to Judge Boulware and to Magistrate Judge George
6 Foley, Jr. on June 4. Judge Boulware issued a minute order on this date, directing a Joint Status
7 Report to be filed by July 4, and that all out of state counsel comply with completion and
8 electronic filing of the Designation of Local Counsel and Verified Petition, all to be filed by July
9 19.

10 The *Vasquez* action was assigned to United States District Judge Andrew P. Gordon and
11 Magistrate Judge Foley, Jr. on June 4. Judge Gordon issued a minute order on this date, directing a
12 Joint Status Report to be filed by July 4, and that all out of state counsel comply with completion
13 and electronic filing of the Designation of Local Counsel and Verified Petition, all to be filed by
14 July 19. On June 5, Judge Gordon directed a joint status report to be filed by June 12.

15 The *Ruediger* action was assigned to United States District Judge James C. Mahan and
16 Magistrate Judge Carl W. Hoffman on June 4. Judge Mahan issued a minute order on this date,
17 directing a Joint Status Report to be filed by July 4, and that all out of state counsel comply with
18 completion and electronic filing of the Designation of Local Counsel and Verified Petition, all to
19 be filed by July 19.

20 The *Kingsbury* action was assigned to United States District Judge Robert C. Jones and
21 Magistrate Judge Nancy J. Koppe on June 4. On June 5, Magistrate Judge Koppe denied the
22 UFC's motion to stay discovery without prejudice; gave the UFC until June 12 to renew the
23 motion, and directed that the motion address case law from this District; and ordered that if the
24 motion was not renewed a joint discovery plan was due by June 19.

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1 **III. CONCLUSION**

2 Plaintiffs concur with the UFC that this matter should be assigned to a single District Court
3 Judge and a single Magistrate Judge.

4 DATED this 9th day of June, 2015

5 **WOLF, RIFKIN, SHAPIRO,**
6 **SCHULMAN & RABKIN, LLP**

7 By: /s/ Don Springmeyer

8 Don Springmeyer
9 Nevada Bar No. 1021
10 Bradley S. Schrager
11 Nevada Bar No. 10217
12 Justin C. Jones
13 Nevada Bar No. 8519
14 3556 E. Russell Road, Second Floor
15 Las Vegas, Nevada 89120
16 (702) 341-5200/Fax: (702) 341-5300
17 dspringmeyer@wrslawyers.com
18 bschrager@wrslawyers.com
19 jjones@wrslawyers.com

15 **COHEN MILSTEIN SELLERS & TOLL,**
16 **PLLC**

16 Benjamin D. Brown
17 Richard A. Koffman
18 Hiba Hafiz
19 1100 New York Ave., N.W., Suite 500, East
20 Tower Washington, DC 20005
21 Telephone: (202) 408-4600/Fax: (202) 408 4699
22 bbrown@cohenmilstein.com
23 rkoffman@cohenmilstein.com
24 hhafiz@cohenmilstein.com

22 **BERGER & MONTAGUE, P.C.**

23 Eric L. Cramer
24 Michael Dell'Angelo
25 1622 Locust Street
26 Philadelphia, PA 19103
27 Telephone: (215) 875-3000/Fax: (215) 875-4604
28 ecramer@bm.net
mdellangelo@bm.net

JOSEPH SAVERI LAW FIRM, INC.

Joseph R. Saveri
Joshua P. Davis
Matthew Weiler
Andrew M. Purdy
Kevin E. Rayhill
505 Montgomery Street, Suite 625
San Francisco, California 94111
Telephone: (415) 500-6800/Fax: (415) 395-9940
jsaveri@saverilawfirm.com
jdavis@saverilawfirm.com
mweiler@saverilawfirm.com
apurdy@saverilawfirm.com
krayhill@saverilawfirm.com

**WARNER ANGLE HALLAM JACKSON &
FORMANEK PLC**

Robert C. Maysey
Jerome K. Elwell
2555 E. Camelback Road, Suite 800
Phoenix, AZ 85016
Telephone: (602) 264-7101/Fax: (602) 234-0419
rmaysey@warnerangle.com
jelwell@warnerangle.com

**LAW OFFICE OF FREDERICK S.
SCHWARTZ**

Frederick S. Schwartz
15303 Ventura Boulevard, #1040
Sherman Oaks, CA 91403
Telephone: (818) 986-2407/Fax: (818) 995-4124
fred@fredschwartzlaw.com

**SPECTOR ROSEMAN KODROFF &
WILLIS, P.C.**

Eugene A. Spector
Jeffrey J. Corrigan
Jay S. Cohen
William G. Caldes
1818 Market Street – Suite 2500
Philadelphia, PA 19103
Telephone: (215) 496-0300/Fax: (215) 496-6611
espector@srkw-law.com
jcorrigan@srkw-law.com
jcohen@srkw-law.com
wcaldes@srkw-law.com

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of June, 2015, a true and correct copy of **PLAINTIFFS' CONSOLIDATED NOTICE OF RELATED CASES (LR 7-2.1)** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By /s/Christie Rehfeld

Christie Rehfeld, an Employee of
WOLF, RIFKIN, SHAPIRO, SCHULMAN &
RABKIN, LLP